REMARKS

A. The Section 103 Rejection of Claims 1-5

Claims 1-5, as well as other claims, were rejected under 35 U.S.C. §103(a) as being unpatentable over Peercy et al., U.S. Patent No. 5,960,429 ("Peercy") in view of Doyle, U.S. Patent Publication No. 2002/0099807 ("Doyle"). Applicant disagrees and respectfully traverses these rejections for at least the following reasons.

Claims 1-5 are directed at a caching method which requires, among other things: the selection of an entry from a set of replaceable entries of a table when a received Internet site name is new and the table is full; and the replacement of the selected entry with the Internet site name entry. In addition, claims 1-5 require that a resource be cached which corresponds to at least one of *r* most frequently used Internet sites.

In contrast, Peercy does not disclose or suggest: (1) caching; (2) selecting an entry from a set of replaceable entries in a table; (3) replacing a selected entry with an Internet site name entry; and (4) caching a resource corresponding to at least one of *r* most frequently used Internet sites, as in claims 1-5 (and new claims 37 and 38) of the present invention.

To overcome these deficiencies in Peercy, the Office Action relies on Doyle. Applicants respectfully submit that the combination of Peercy and Doyle do not render obvious claims 1-5 and 37-38 of the present invention.

As indicated above, Peercy fails to disclose or suggest the selection of an entry from a set of replaceable entries of a table and replacing the selected

entry with a new Internet site name entry. Doyle does not disclose or suggest anything to overcome this deficiency. In fact, Doyle explicitly disavows the use of replacement methods which do not take into account the cost associated with recreating cache pages versus recreating new pages. In sum, Doyle teaches away from claims 1-5 and 37-38 of the present invention.

Though Doyle appears to suggest that prior art systems exist that replace a cache page with a new page based on how frequently the cached pages are accessed, Doyle does not indicate that these prior art systems first select an entry from a set of replaceable entries in a table and then replace a selected entry with a new entry as in claims 1-5 and 37-38 of the present invention.

As indicated in the present application's specification on page 1, line 27 through page 2, line 5, there exist techniques which replace pages based on how frequently cached pages are accessed, typically use thresholds (see also Peercy, paragraph 4, lines 48-55). Such prior art techniques require too much memory space and computing power, disadvantages which are overcome by the present invention.

Accordingly, it is respectfully submitted that claims 1-5 and new claims 37-38 would not have been obvious to one of ordinary skill in the art upon reading the disclosures of Peercy in combination with Doyle at the time the application was filed. Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 1-5 and 37-38.

B. The Section 103 Rejections of Claims 6-15

It is respectfully submitted that claims 6-15 and new claims 39 and 40 are patentable over a combination of Peercy and Doyle for the reasons set forth above with respect to claims 1-5 and 37-38. Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 6-15, 39 and 40.

C. The Section 103 Rejections of Claims 16-20 and 22-26

Claims 16-20 and 22-26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Peercy in view of Doyle and in further view of Blitz, U.S. Patent No. 6,047,293 ("Blitz"). Applicant respectfully disagrees and traverses these rejections for at least the following reasons.

Initially, Applicant notes that claims 16-20 and 22-26 are patentable over a combination of Peercy, Doyle and Blitz for the reasons given above with respect to claims 1-5 and 37-38 because Blitz does not disclose or suggest anything to overcome the deficiencies of the combination of Peercy and Doyle set forth above.

In addition, as the Office Action admits, the combination of Doyle and Peercy do not disclose or suggest the conversion of an Internet site name into a number and storing that so-converted number in an entry in a table, among other things.

Applicant respectfully submits that the combination of Blitz with Peercy and Doyle is improper.

In order for such a combination to arguably render the claims obvious, either the intended purpose of Blitz or Blitz's principle of operation (or conversely, the intended purpose or principle of operation of Peercy and Doyle) must be modified from an automatic test equipment (ATE) application to an Internet caching application. Such a modification is impermissible (see MPEP 2143.01).

Further, Applicant notes that claims 16-20, 22-26, 39 and 40 require conversion of an Internet site name to a hash number. Neither Peercy, Doyle nor Blitz taken separately or in combination discloses or suggests such a conversion.

In sum, Applicant respectfully submits that the combination of Peercy, Doyle and Blitz is impermissible and even if permissible, does not render obvious the subject matter of claims 16-20, 22-26, 39 and 40.

Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 16-20, 22-26, 39 and 40.

D. <u>The Section 103 Rejections of Claims 27-31 and 33-36</u>

It is respectfully submitted that claims 27-31 and 33-36 are patentable over a combination of Peercy, Doyle and Blitz for the reasons set forth above with respect to claims 16-20, 22-26, 39 and 40.

Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 27-31 and 33-36.

E. The Section 103 Rejections of Claims 21 and 32

Claims 21 and 32 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Peercy, in view of Doyle, in view of Blitz and in further view of Jones et al., U.S. Patent No. 6,134,603 ("Jones"). Applicant respectfully disagrees and traverses these rejections for at least the following reasons.

Initially, Applicant notes that claims 21 and 32 are patentable over Peercy, Doyle, Blitz and Jones for the reasons set forth above with respect to claims 16-20, 22-26, 27-31, 32-36 and 39-42.

In addition, as the Office Action points out, the combination of Peercy, Doyle and Blitz do not disclose or suggest the use of a hash number to represent an Internet site name. This feature, which was originally in claims 21 and 32 has now been placed in independent claims 16 and 27. Accordingly, claims 21 and 32 have been cancelled.

With respect to independent claims 16 and 27, Applicant respectfully submits that these claims are additionally patentable over the combination of Peercy, Blitz, Doyle and Jones for at least the following reasons.

Independent claims 16 and 27, and the claims that depend from them, require the conversion of a received Internet site name into a hash number. In contrast, Jones does not disclose or suggest such a conversion. Instead, Jones discloses the use of a hash mark to represent a "remote object." The remote objects in Jones are not Internet websites. Instead, they appear to be application (computer) programs.

It is respectfully submitted that the claims of the present invention which require Internet websites to be converted into hash numbers would not have been obvious to one of ordinary skill in the art upon reading Jones, separately or in combination with Peercy, Doyle and Blitz at the time the present application was filed. Computer programs, at least those disclosed or suggested in Jones, are not equated with Internet site names nor are they suggestive of Internet site names.

Accordingly, Applicant respectfully submits that claims 16-20, 22-26, 27-31, and 33-42 are in condition for allowance.

F. The Objection to Claim 26

The Office Action states that, in the text of claim 26, the variable "m/q" is used. However, in the version of claim 26 that Applicant has in his possession the variable is written as "n/q".

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number of the undersigned below.

In the event this Response does not place the present application in condition for allowance, applicant requests the Examiner to contact the undersigned at (703) 668-8000 to schedule a personal interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By _____

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